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*Attorneys for Plaintiff MGM Grand Hotel, LLC
d/b/a MGM Grand*

UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

MGM GRAND HOTEL, LLC d/b/a MGM
GRAND;

Plaintiff,

v.

KEVIN CHANG SHENG LONG,

Defendant.

Case No. 2:21-cv-001476-APG-NJK

**STIPULATION AND ORDER TO
EXTEND DEADLINE TO ADDRESS
PLAINTIFF'S REMAINING CLAIMS
(FIRST REQUEST)**

Pursuant to LR IA 6-1 and 6-2, Plaintiff MGM Grand Hotel, LLC d/b/a MGM Grand ("Plaintiff"), by and through its counsel, Lawrence J. Semenza, III, Esq. and Katie Cannata, Esq. of the law firm Semenza Kircher Rickard, and Defendant Kevin Chang Sheng Long ("Long"), by and through his counsel, Lawrence C. Hill, Esq. of Lawrence C. Hill & Associates, hereby stipulate and agree to the following:

1. On August 22, 2022, the Court issued an Order Granting in Part Plaintiff's Motion for Summary Judgment and Denying Motion to Strike as Moot. [ECF No. 41.]

2. The Court ordered that by August 29, 2022, Plaintiff shall either (1) dismiss its two remaining claims against Long and prepare a proposed form of judgment reflecting the total amount due as of September 1, 2022, or (2) advise the court how it intends to proceed on its

1 claims for Unjust Enrichment and Breach of the Implied Covenant of Good Faith and Fair
2 Dealing.

3 3. The Parties require additional time to continue to explore a potential resolution of
4 this case and determine how to proceed with Plaintiff's remaining claims. The Parties believe
5 that an additional two (2) weeks will be sufficient in order for counsel to confer with their
6 respective clients as to the foregoing issues.

7 4. Accordingly, the Parties hereby request that the current deadline of August 29,
8 2022 be extended for an additional two (2) weeks, up to and including September 12, 2022.

9 DATED this 29th day of August, 2022.

DATED this 29th day of August, 2022.

10 SEMENZA KIRCHER RICKARD

LAWRENCE C. HILL & ASSOCIATES

11 /s/ Katie L. Cannata

/s/ Lawrence C. Hill


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14 *Attorneys for Plaintiff*

Attorneys for Defendant

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16 IT IS SO ORDERED.

17
18 
United States District Court Judge

19 Dated: August 31, 2022

SEMENTA KIRCHER RICKARD
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